

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KLEIMAR, N.V.,

Plaintiff,

against

DALIAN DONGZHAN GROUP CO., LTD.  
BENXI BEIYING IRON AND STEEL GROUP  
IMPORT AND EXPORT CORP. LTD.,  
BEIGANG HONG KONG LIMITED, and  
BEITAI IRON & STEEL GROUP CO., LTD.,

x

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: ECF CASE

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: 16 CV 9486 (AJN) (DCF)

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: **ANSWER OF**  
**GARNISHEE MACSTEEL**  
**INTERNATIONAL**  
**USA CORP.**

:

Defendants.

:

:

x

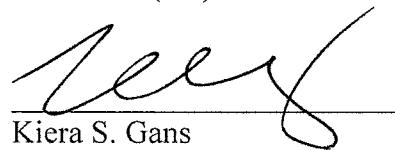
TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims  
of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime  
Attachment and Garnishment in the above-captioned matter dated December 23, 2016, and  
served upon Garnishee MACSTEEL INTERNATIONAL USA CORP. (“MACSTEEL”) on or  
about December 27, 2016, Garnishee MACSTEEL hereby states that on such date of service, it  
was not indebted to the Defendants DALIAN DONGZHAN GROUP CO., LTD., BENXI  
BEIYING IRON AND STEEL GROUP, IMPORT AND EXPORT CORP. LTD., BEIGANG  
HONG KONG LIMITED, or BEITAI IRON & STEEL GROUP CO., LTD (collectively,  
“Defendants”), and did not otherwise have in its possession any property, tangible or intangible,  
including funds, assets, cash, good, chattels, credits, effects, debts, owed by or owed to the  
Defendant(s) or monies to be paid to discharge a debt owed to the Defendant(s), including  
monies being transferred by, to or for the benefit of the Defendant(s).

Dated: New York, New York  
January 17, 2017

DLA PIPER LLP (US)

By:



Kiera S. Gans  
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Neal F. Kronley  
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(212) 335-4501 (fax)

*Attorneys for Garnishee  
Macsteel International USA Corp.*

**VERIFICATION**

STATE OF NEW YORK      )  
                                ) ss:  
COUNTY OF NEW YORK    )

Margo Rosner Marks, being duly sworn, deposes and says as follows:

I am the Managing Director for Macsteel International USA Corp. ("Macsteel"). I have reviewed the contents of the foregoing Answer of Garnishee Macsteel in response to Plaintiffs' Maritime Attachment and Garnishment in Docket No. 16 Civ. 09486(AJN) and know the contents thereof and that the same are true to Macsteel's files, and communications with relevant employees of the company.

A handwritten signature in black ink, appearing to read "M. Rosner Marks".

Margo Rosner Marks

Sworn to before me on  
January 17, 2017

A handwritten signature in black ink, appearing to read "Dinetah Faith Sims".

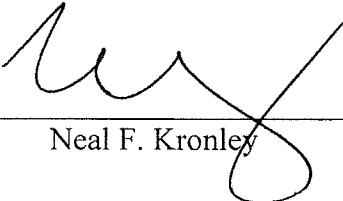
Notary Public

**CERTIFICATE OF SERVICE**

I, Neal Kronley, hereby certify that on the 17th day of January, 2017, I caused the foregoing Answer of Garnishee Macsteel International USA Corp. in Response to Maritime Attachment and Garnishment to be served by ECF and email upon:

Kevin J. Lennon, Esq.  
LENNON, MURPHY & PHILLIPS, LLC  
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New York, New York 10170  
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(212) 490-6070  
[klennon@lmplaw.net](mailto:klennon@lmplaw.net)  
*Counsel for Plaintiff*

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Neal F. Kronley